

FACT SHEET

DRAFT HAZARDOUS WASTE PERMIT

PREPARED FOR

Basic Chemicals Company, LLC

EPA ID# LAD 092681824

Agency Interest# 3400

Activity# PER19980002

**Ascension Parish
Geismar, Louisiana**

**Post-Closure Permit
(LAD 092 681 824- PC-1)**

I. INTRODUCTION

This fact sheet has been developed in accordance with the Louisiana Administrative Code (LAC) 33:V.703.D and briefly sets forth principal facts and the significant factual, legal, methodological, and policy requirements of the draft post-closure permit for the Basic Chemicals Company, LLC, EPA ID Number LAD 092 681 824, located in Geismar, Ascension Parish, Louisiana.

Basic Chemicals is seeking a hazardous waste post-closure permit for the Stormwater Flume, Acid Lagoon, Caustic Pond, Hypochlorite Pond 1 and Hypochlorite Pond 2.

The proposed draft hazardous waste post-closure permit for the surface impoundments addresses the requirements of LAC Title 33, Part V, Subpart 1 and the Federal Resource Conservation and Recovery Act (RCRA) as amended by the 1984 Hazardous and Solid Waste Amendments (HSWA). The Louisiana Department of Environmental Quality (LDEQ) has prepared this draft hazardous waste permit for the closed units.

II. THE PERMITTING PROCESS

The purpose of this fact sheet is to initiate the permitting decision process. The Office of Environmental Services-Water and Waste Permits Division (OES-WWPD) of the Louisiana Department of Environmental Quality (LDEQ) is required to prepare this draft hazardous waste post-closure permit. It sets forth all the applicable conditions, which the OES - WWPD requires the permittee to comply with during the life of the permit.

The permitting process will afford LDEQ, interested citizens and any other agency the opportunity to evaluate the ability of the permittee to comply with the requirements of LAC 33:V.Subpart 1, and the HSWA portion.

The public is given a minimum of forty-five (45) days to review and comment on the draft hazardous waste post closure permit. The Administrative Authority, before deciding or taking any final action on the new draft modification to the hazardous waste permit, will consider all appropriate comments. The decision of the Administrative Authority will be to issue, deny, or modify the draft hazardous waste permit in accordance with LAC 33:V.705.

A. DRAFT HAZARDOUS WASTE PERMIT

The Louisiana Department of Environmental Quality-Office of Environmental Services (LDEQ-OES), Water and Waste Permits Division reviewed the permit application and other pertinent technical information, and prepared a draft hazardous waste permit that contains the language pertaining to post-closure care of the listed units.

This draft hazardous waste permit is a tentative determination and is not the final decision of the Administrative Authority.

B. PUBLIC COMMENT PROCEDURES

LAC 33:V.715 requires that the public be given at least forty-five (45) days to comment on a draft permit decision.

The specific dates for the opening and closing of the public comment period are contained in the public notice that was issued for this particular permitting action. Any person interested in commenting on the draft permit for the Geismar facility must do so within the forty-five (45) day comment period.

Public notice of the proposed action and of the hearing shall be published in specified newspapers, announced on the designated radio station, and mailed to those persons contained on the facility's mailing list.

C. LOCATIONS OF AVAILABLE INFORMATION

The administrative record, including all supporting documents, are on file at the LDEQ Public Records Center, Room 1-127, 602 North 5th Street, Baton Rouge, Louisiana. These documents may be inspected and copied (at \$0.25 per copy page) at any time between the hours of 8:00 to 4:30 p.m., Monday through Friday (except holidays).

In addition, a copy of all supporting documents relative to this permitting action is available for review at the Ascension Parish Library – Gonzales Branch, 708 South Irma Boulevard, Gonzales, Louisiana, 70737.

D. WRITTEN COMMENT SUBMISSION

Interested persons may submit written comments on this draft permit decision to the Administrative Authority, at the address listed below, no later than 12:30 p.m., on the closing date of the comment period.

All comments should include:

- (1) the name and address of the commentor,
- (2) a concise statement of the exact basis for any comment and supporting relevant facts upon which the comment is based,
- (3) identification of the facility commented on (the EPA Identification Number and the AI Number), and
- (4) supporting relevant facts upon which the comments are based.

All comments, requests for a public hearing, further requests for information (including copies of this decision and fact sheet) or any requests by public interest groups or individuals who would like to be included in the mailing list, should be made in writing to:

Ms. Soumaya Ghosn
Louisiana Department of Environmental Quality
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313
(225) 219-3276 or fax (225) 219-3309

Any technical questions regarding this draft permit should be addressed to:

Ms. Toni Metoyer Booker
Louisiana Department of Environmental Quality
Office of Environmental Services
Water and Waste Permits Division
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313
(225) 219-0956 or fax (225) 219-3158

III. DESCRIPTION OF OVERALL SITE

The Basic Chemicals Company, Geismar Plant is a chemical complex located approximately 20 miles southeast of Baton Rouge, near the community of Geismar in Ascension Parish. The facility currently produces chlorine, sodium hydroxide, muriatic acid, hydrogen gas, and the following chlorosolvents: ethylene dichloride, perchloroethylene, methylene chloride, methyl chloride, carbon tetrachloride, chloroform, and methyl chloroform.

IV. HAZARDOUS WASTE FACILITIES

The Acid Lagoon, Caustic Pond, Hypochlorite Pond 1, Hypochlorite Pond 2, and Stormwater Flume were interim status facilities which were closed in accordance with approved closure plans. All units were certified closed in July, 1989. The proposed post-closure permit will enable the performance of maintenance and groundwater monitoring activities on the permitted units.

The Acid Lagoon was placed into service in 1969 to temporarily store acidic plant process wastewater prior to discharge via a permitted outfall. From 1977 to 1983 it was used to store acidic water prior to treatment in the NPDES system. From 1984 to 1987 the Acid Lagoon was used intermittently for short term (1-2) day storage. The impoundment is located in the northwest part of the developed plant in the Final Effluent Processing (FEP) area. The approximate capacity of the Acid Lagoon was 650,000 gallons.

The Caustic Pond was placed into service in 1977 as a settling and off specification pond for wastewater prior to discharge to a permitted outfall. In March, 1981, the impoundment began receiving alkaline process wastewater for storage prior to treatment in the facility's wastewater treatment system. The Caustic Pond is located in the Northwest part of the developed plant site in the Final Effluent Processing area due west of the Acid Lagoon. Approximate maximum capacity of the Caustic Pond was 600,000.gallons.

The Stormwater Flume was placed into service in 1968 to manage stormwater runoff originating from the product storage area and the Perchloroethylene/Ethylene Dichloride production areas. Water contained in the Stormwater Flume was managed in the NPDES outfall to the Mississippi River. The Stormwater Flume had a maximum liquid capacity of 500,000 gallons. The Stormwater Flume is located in the northwest part of the developed plant site in the Final Effluent Processing (FEP) area.

Hypochlorite Pond 1 and Hypochlorite Pond 2 were placed into service during late 1976 to store a caustic bleach solution. While stored in the impoundments, the bleach was reacted with hydrogen peroxide. The resulting caustic wastewater was then transferred to the NPDES wastewater treatment system. The two hypochlorite impoundments are located in the southwest corner of the developed plant site. Hypochlorite Pond 1 had a maximum liquid capacity of 100,000 gallons. Hypochlorite Pond 2 had an approximate capacity of 90,000 gallons and was generally used for handling excess volume from Hypochlorite Pond 1.

V. FINANCIAL ASSURANCE FOR POST-CLOSURE REQUIREMENTS

The applicant has provided financial assurance of post-closure care in the form of a Corporate Guarantee, and in accordance with the approved post-closure plan and most recent post-closure cost estimate for the facility. The owner or operator has satisfied the requirements by demonstrating that he passes a financial test as specified in LAC 33:V.3711.F.

VI. SUMMARY OF ENVIRONMENTAL FACTORS CONSIDERED

Pursuant to La.R.S.30:2018.E.3, this draft hazardous waste post-closure permit is not subject to the requirements regarding environmental assessment statements or IT Analysis (See Save Ourselves v. Louisiana Environmental Control Commission 1152 (La. 1984)). Nevertheless the LDEQ has considered some factors similar to IT questions in preparing this draft permit. This is a preliminary analysis based on information currently available to the LDEQ.

- A. The potential and real adverse environmental effects of the proposed project have been avoided to the maximum extent possible.
- B. A cost benefit analysis of the environmental impact balanced against the social and economic benefits of the project demonstrates that the social and economic benefits outweigh environmental impacts.
- C. There are no alternative projects or alternative sites or mitigating measures which offer more protection to the environment than the proposed project without unduly curtailing non-environmental benefits to the extent applicable.

The facility will enter a RCRA permitted post-closure care period of thirty (30) years. During this post-closure care period, the groundwater monitoring and corrective action programs will continue. At the end of the initial thirty-year post-closure care period the groundwater around the unit will be evaluated. If it is determined that there is no future risk of contamination, the post-closure care period will end. If a risk of contamination remains, the post-closure care period will be extended.

The alternative to the proposed permitting action is to remove waste and affected soils from the impoundments and to subsequently incinerate the materials off-site at permitted hazardous waste incinerator. These materials will then be placed in a hazardous waste landfill. This would unduly increase the cost of the remediation operation and the time required for the cleanup operation.

Additionally, if incineration was used, there would be the increased economic cost associated with incineration of the wastes, and an increased risk to workers handling the wastes. In order for the soils to be incinerated at an off-site permitted hazardous waste incinerator, the waste and affected soils must first be packed into approved drums. The large amount of material that must be processed would result in high risks from industrial hygiene exposures

to workers performing the repackaging. The proposed permitting action reduces these risks and provides for much safer industrial hygiene conditions.